

**EXHIBIT 61**  
**FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 -----X

4 Jane Doe 1, individually and on behalf of

5 all others similarly situated,

6

Plaintiff,

Case No.

1:22-cv-10019 (JSR)

7 v.

8 JPMorgan Chase Bank, N.A.,

Defendant.

9 -----

10 GOVERNMENT OF THE UNITED STATES

11 VIRGIN ISLANDS,

Case No.

1:22-cv-10904 (JSR)

12 Plaintiff,

13 v.

14 JPMORGAN CHASE BANK, N.A.,

15 Defendant

16 -----

17 \*\* CONFIDENTIAL PORTION UNDER SEPARATE COVER \*\*

18 \*\* DEPOSITION OF MARY ERDOES \*\*

19 Wednesday, March 15, 2023

20

21

22

23 Reported by:

24 Angela M. Shaw-Crockett, CCR, CRR, RMR

1 A. No.

2 Q. It's not something that you would ever  
3 hope anyone at the bank would condone, right?

4 A. Correct.

5 Q. And if the bank was aware or became aware  
6 that Jeffrey Epstein was abusing young girls or  
7 women, you would recommend that he be terminated as  
8 a client at the bank, correct?

9 A. I wasn't -- I wasn't part of those  
10 conversations, and there's -- those conversations  
11 have lots of facts and circumstances around them.  
12 So it would just -- it would depend.

13 Q. I must have asked a bad question. So my  
14 question is hypothetically, if you were to learn and  
15 believe that Jeffrey Epstein was sexually abusing  
16 children and young women, would it be your position  
17 that Jeffrey Epstein should be terminated as a  
18 client at the bank?

19 A. If I learned and believed that he was  
20 sexually abusing young children, yes, he would be --  
21 I would ask to have him exited from the bank.

22 Q. And if you hypothetically learned that  
23 Jeffrey Epstein was running a particular type of  
24 sexual abuse scheme where he was inviting young

1 hush payments to victims and recruiters and things  
2 of that nature, correct?

3 A. Those two things, unfortunately, never  
4 came together in my mind.

5 Q. Okay. It's not until right now that we're  
6 having this discussion that things are kind of  
7 starting to -- the puzzle is coming together?

8 MR. JOHNSON: Objection.

9 You can answer.

10 A. At the time, the concern was the cash  
11 payments, and at the time, the cash payments were  
12 related to airplane usage.

13 And never at the time was that something  
14 that I was connecting in my mind with anything to do  
15 with any of the allegations of what he may or may  
16 not have done, and I wasn't aware of any ongoing  
17 things that Mr. Epstein was doing, and the two  
18 things never -- they never came to my mind to  
19 connect them.

20 BY MR. EDWARDS:

21 Q. With respect to the cash payments, if you  
22 believed that he was withdrawing cash because that's  
23 the way -- that's the way it was necessary to make  
24 payments for jet fuel, that's not somebody that you

1 would terminate from the bank if you believed that  
2 story, right?

3 A. Correct.

4 Q. So he gave an explanation as to why these  
5 massive amounts of cash were being withdrawn from  
6 the bank, but fair to say it was not a believable  
7 explanation, correct?

8 A. I thought the explanation was an outsized  
9 amount of cash, and even though that was his  
10 explanation for where the cash was being used, that  
11 in conjunction with the culmination of everything  
12 else and the fact that I didn't know or like  
13 Mr. Epstein, I had no reason to vouch for  
14 Mr. Epstein to be a client of the bank, and I  
15 recommended exit and we exited.

16 Q. Do you believe that just with the analysis  
17 that you did in 2013 that you made the right  
18 decision, the responsible decision on behalf of the  
19 bank, to exit Mr. Epstein as a client?

20 A. I am glad I exited Mr. Epstein from the  
21 bank.

22 Q. And when he was exited from the bank, did  
23 you learn immediately that he was going to set up  
24 new accounts at Deutsche Bank?

1 Q. Do you know what that zone was?

2 A. I don't. I just don't.

3 Q. Do you agree each client's AML risk should  
4 be reassessed if material new information or  
5 unexpected account activity is identified?

6 A. I believe that generally happens.

7 Q. And do you believe financial institutions  
8 must establish criteria for determining when a  
9 client relationship poses too high a risk and  
10 therefore must be terminated?

11 A. I don't know what -- generally, what you  
12 said, yes.

13 Q. With respect to the news articles that  
14 were presented to you over the time that you were at  
15 JPMorgan, do you remember that allegations against  
16 Jeffrey Epstein began as early as March 2005 with an  
17 accusation that he paid a 14-year-old girl for a  
18 massage?

19 A. I don't remember the specific allegations.

20 Q. Do you remember allegations that the  
21 Palm Beach police uncovered dozens of underage  
22 victims of sexual abuse?

23 A. I don't -- I don't remember the -- aside  
24 from what we just saw earlier, I don't remember what

1 the specifics were.

2 Q. When you were hearing the allegations over  
3 time, let's say -- do you remember when  
4 Jeffrey Epstein was first arrested in 2006?

5 A. Yes.

6 Q. And because of the nature of the charges,  
7 that it's allegedly sex with minors, that's a big  
8 deal, right, for a client?

9 A. Any allegation is taken very seriously.

10 Q. But if it's an allegation of trespassing,  
11 it's taken less seriously than sex with a minor?

12 A. I can't judge the seriousness with which  
13 they take it.

14 Q. Okay. Did you speak with Jes Staley in  
15 the 2006 time period about the fact that  
16 Jeffrey Epstein had been arrested?

17 A. I remember Jes discussing that -- I sort  
18 of don't know where or when -- that his  
19 characterization of Jeffrey was very different than  
20 the press situation. And -- yeah, that's what I  
21 remember.

22 Q. Did you know that Jes was going to visit  
23 Jeffrey at various houses of his?

24 A. So I remember the email that I think we

1 BY MR. NARWOLD:

2 Q. This is a series of emails between you and  
3 Mr. Duffy, and this is just about the time you were  
4 exiting Mr. Epstein, correct?

5 A. Yes. Sorry. I'm just reading through it  
6 first here.

7 Q. Yep.

8 A. Okay.

9 Q. If you look at the bottom email on the  
10 first page, it's from Mr. Duffy to you. It says "Re  
11 JE."

12 And can you tell, from the content of this  
13 email, this is Mr. Epstein?

14 A. It was around the time that we were  
15 exiting Mr. Epstein, so might be, yes.

16 Q. You see the sentence talking about the  
17 impact of his cash activities?

18 A. Yes.

19 Q. The second paragraph says:

20 "Separately he maintains he will be  
21 [REDACTED] primary advisor and there will be  
22 other client assignments in the future. I  
23 told him we would work with him as long as  
24 it was through the client accounts, JE

1                   entities would not be acceptable."

2                   And you respond with a "Y." Does that  
3                   mean yes?

4                   A. Probably, yes.

5                   Q. Was it your understanding at this time  
6                   that it was okay for the bank to deal with  
7                   Mr. Epstein so long as it wasn't in his own  
8                   accounts?

9                   A. So we can't stop someone from being  
10                   affiliated with somebody else. But we wouldn't be  
11                   taking direction from him is how I read this.

12                   MR. NARWOLD: I'm going to show you what  
13                   I've marked as 50 and 51. I believe they go  
14                   together.

15                   (Erdoes Exhibit 50 was received and marked  
16                   for identification, as of this date.)

17                   (Erdoes Exhibit 51 was received and marked  
18                   for identification, as of this date.)

19                   BY MR. NARWOLD:

20                   Q. That's 50 and that's 51.

21                   A. Okay.

22                   Q. This is an email and an attachment dated  
23                   July 16, 2013. Looks like it's anticipation of a  
24                   meeting on the following day, the 17th.